

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Creedon Controls, Inc., a Delaware corporation,	)	
	)	C. A. No. 05CV300 (JJF)
Plaintiff,	)	
	)	
v.	)	
	)	
Banc One Building Corporation, an Illinois	)	
corporation; and Forest Electric Corporation, a	)	
New York corporation,	)	
	)	
Defendants.	)	

**PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

Plaintiff, Creedon Controls, Inc.(hereinafter "Plaintiff"), by and through its attorneys, Cohen, Seglias, Pallas, Greenhall & Furman, P.C., hereby discloses, pursuant to Federal Rule of Civil Procedure 26(a)(1):

(a)(1)(A): The names, addresses, and telephone numbers of known individuals likely to have discoverable information to support Plaintiff's claims are set forth in Exhibit "A" attached hereto.

(a)(1)(B): Plaintiff is producing herewith, to Defendants, documents bearing Bates Stamp Nos. 00000 through 003233.

Further, Plaintiff will rely upon:


1. Plaintiff's certified payroll, previously provided throughout the project to Willis of Illinois, Inc., Banc One's OCIP Administrator;
2. Plaintiff's payroll records (2003-2004) containing substantially the same information as contained in the certified payroll records;
3. Plaintiff's packing slips and invoices; and

4. Submittals provided to Forest Electric throughout the project.

The above four categories are not supplied at this time, in light of the sheer volume of documents described.

(a)(1)(C) Damages claimed by Plaintiff are delineated in the Bill of Particulars attached as Exhibit "C" to the Complaint and Statement of Claim for Mechanical Lien, and as set forth in the numerous Applications and Certifications for Payment (See Bates Nos. 00716-00815). Reference is further made to documents bearing Bates Nos. 00000 through 003233, which are being provided to Defendants.

**Cohen, Seglias, Pallas, Greenhall  
& Furman, P.C.**



Robert K. Beste, Jr., Esq. (I.D. No. 154)  
1007 Orange Street  
Nemours Building, Suite 205  
Wilmington, DE 19801  
(302) 425-5089  
Attorney for Plaintiff Creedon Controls,  
Inc.

Date: \_\_\_\_\_

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